

STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NOS. 2017-207-E; 2017-305-E; and 2017-370-E
(consolidated)

In Re: Friends of the Earth and Sierra Club,)
Complainant / Petitioner v. South Carolina)
Electric & Gas Company,)
Defendant/Respondent)

In Re: Request of the South Carolina Office)
of Regulatory Staff for Rate Relief to)
SCE&G Rates Pursuant to S.C. Code Ann. §)
58-27-920)

In Re: Joint Application and Petition of)
South Carolina Electric & Gas Company and)
Dominion Energy, Incorporated for Review)
and Approval of a Proposed Business)
Combination between SCANA Corporation)
and Dominion Energy, Incorporated, as May)
Be Required, and for a Prudency)
Determination Regarding the Abandonment)
of the V.C. Summer Units 2 & 3 Project and)
Associated Customer Benefits and Cost)
Recovery Plan)

MOTION FOR ADMISSION
Pro Hac Vice

Intervenors South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) hereby move the Public Service Commission of South Carolina (“Commission”) to permit Gudrun Elise Thompson to practice pro hac vice before the Commission in the above-captioned proceeding.

Pursuant to Rule 404, SCACR, Ms. Thompson, with the consent of counsel of record, has submitted to the South Carolina Supreme Court a Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, CCL and SACE respectfully request that this motion be granted.

This 5th day of October, 2018.

s/ J. Blanding Holman, IV
J. Blanding Holman, IV
Southern Environmental Law Center
463 King Street, Suite B
Charleston, SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039

*Attorney for Petitioners South Carolina
Coastal Conservation League and
Southern Alliance for Clean Energy*

VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE* IN THE STATE OF SOUTH CAROLINA

In the Matter of:

Joint Application and Petition of
South Carolina Electric & Gas
Company and Dominion Energy,
Inc. for Review and Approval of a
Proposed Business Combination
between SCANA Corporation and
Dominion Energy, Inc. as May Be
Required, and for a Prudency
Determination Regarding the
Abandonment of the V.C. Summer
Units 2 & 3 Project and Associated
Customer Benefits and Cost
Recovery Plans

Docket Nos. 2017-370-E;
2017-207-E; 2017-305-E
(consolidated)

Public Service Commission of
South Carolina

Plaintiff	Case No.	Tribunal
vs.	Mailing Address of Tribunal:	101 Executive Center Drive, Suite 100 Columbia, SC 29210
Defendant		

Comes now Gudrun Elise Thompson, applicant herein, and respectfully represents the following:

1. Applicant resides at:

<u>514 Gibbon Dr.</u>			
Street Address			
<u>Chapel Hill</u>	<u>Orange</u>	<u>NC</u>	<u>27516</u>
City	County	State	Zip Code
<u>919-968-4643</u>			
Telephone			

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)
Southern Environmental Law Center, with offices at

<u>601 W. Rosemary Street, Suite 220</u>			
Street Address			
<u>Chapel Hill</u>	<u>Orange</u>	<u>NC</u>	<u>27516</u>
City	County	State	Zip Code
<u>919-967-1450</u>		<u>919-929-4921</u>	<u>gthompson@selcnc.org</u>
Primary Telephone	Cell Phone	Fax Number	Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by

The South Carolina Coastal Conservation League and Southern Alliance
for Clean Energy _____ to provide legal representation in
connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since August of 2002 _____, applicant has been, and presently is, a
member in good standing of the bar of the highest court of the District of Columbia or the State of
North Carolina _____ where applicant regularly practices law. Attached is a certificate of good
standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State
where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts
applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of
Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
North Carolina state courts	August 27, 2002
US District Court for the Eastern District of North Carolina	September 5, 2002
4 th Circuit Court of Appeals	March 2, 2018

Applicant is presently a member in good standing of the bars of those courts listed above, except as
listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice
before.)

N/A

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been
formally notified of any complaints pending before a disciplinary agency, except as provided below (give
particulars, e.g., jurisdiction, court date):

N/A

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction
denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court,
docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any court or
administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court,
administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is J. Blanding Holman, IV
of the Southern Environmental Law Center _____ law firm, which has offices at:

463 King Street, Suite B

Street Address

Charleston

City

Charleston

County

South Carolina

State

29403

Zip Code

843-720-5270		843-414-7039	bholman@selcsc.org
Primary Telephone	Cell Phone	Fax Number	Email Address
72260			
South Carolina Bar Number			

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

Case Name: In the Matter of: Application of Duke Energy Carolinas, LLC for Approval of Energy Efficiency Plan Including an Energy Efficiency Rider and Portfolio of Energy Efficiency Programs (S.C. Public Service Commission)

Docket No. 2007-358-E

Status: Docket closed

Date of Application: January 25, 2008

Application Granted

Local Counsel of Record: J. Blanding Holman IV

Case Name: In the Matter of Environmental Defense Fund, et al. v. S.C. Department of Health and Environmental Control (South Carolina Administrative Law Court)

No. 09-ALJ-07-0166-CC

Status: Case dismissed with prejudice pursuant to consent order

Date of Application: May 4, 2009

Application Granted

Local Counsel of record: J. Blanding Holman IV

Case Name: In the Matter of: Application of Duke Energy Carolinas LLC for Authority to Adjust and Increase Its Electric Rates and Charges (S.C. Public Service Commission)

Docket No. 2009-226-E

Status: Docket open

Date of Application: November 6, 2009

Application Granted

Local Counsel of record: J. Blanding Holman IV

Case Name: SCE&G Company's Request for Approval of Demand Side Management Plan Including a Demand Side Management Rate Rider and Portfolio of Energy Efficiency Programs, (S.C. Public Service Commission)

Docket No. 2009-261-E

Status: Docket open

Date of Application: January 12, 2010

Application Granted

Local Counsel of record: J. Blanding Holman IV

Case Name: Application Regarding the Acquisition of Progress Energy, Inc. by Duke Energy Corporation and Merger of Progress Energy Carolinas, Inc. and Duke Energy Carolinas, LLC (S.C. Public Service Commission)

Docket No. 2011-158-E

Status: Docket open

Date of Application: October 4, 2011

Application Granted

Local Counsel of record: J. Blanding Holman IV

Case Name: Joint Application of Duke Energy Carolinas, LLC and North Carolina Electric Membership Corporation for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of a 750MW Combined Generating Plant Near Anderson, SC

Docket No. 2018-392-E

Status: Docket open

Date of Application: December 20, 2013

Application Granted

Local counsel of record: J. Blanding Holman IV

Case Name: Duke Energy Carolinas, LLC Annual Review of Base Rates for Fuel Costs

Status: Docket closed

Date of Application: August 19, 2014

Application Granted

Local counsel of record: J. Blanding Holman IV

Case Name: Petition of SCE&G for Updates and Revisions to Schedules Related to the Construction of a Nuclear Base Load Generation facility at Jenkinsville, South Carolina (S.C. Public Service Commission

Docket No. 2016-223-E)

Status: Docket open

Date of Application: September 27, 2016

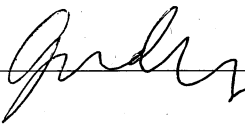
Application Granted

Local counsel of record: J. Blanding Holman IV

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 5 day of October, 20 18



APPLICANT

VERIFICATION

STATE OF North Carolina)

COUNTY OF Orange)

I, Gudrun E. Thompson, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

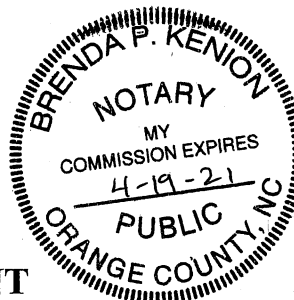
[Signature]
APPLICANT/AFFIANT

Subscribed and sworn to before me this 5th day of October, 20 18

Brenda P. Kenion
Brenda P. Kenion

Notary Public for the State of NC

My Commission Expires: 4-19-21



LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 5th day of October, 20 18

J. Blanding Holman IV (with express permission by R. Dunn)
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this

5th day of October, 20 18

[Signature]
APPLICANT/AFFIANT

Supreme Court OF THE STATE OF NORTH CAROLINA



I, Amy L. Funderburk, Clerk of the Supreme Court of North Carolina, do hereby certify that on August 27, 2002, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

GUDRUN ELISE THOMPSON

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this October 1, 2018.

A handwritten signature in cursive script, reading "Amy L. Funderburk".

Amy L. Funderburk
Clerk of the Supreme Court
of the State of North Carolina